

EXHIBIT

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**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION THIS DOCUMENT RELATES TO: <i>Sharon Creager-Awichi v. Ethicon, Inc., et al</i> Case No. 2:12-cv-05184	Master File No. 2:12-MD-02327 MDL No. 2327 JOSEPH R. GOODWIN U.S. DISTRICT JUDGE
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**PLAINTIFFS' DESIGNATION AND
DISCLOSURE OF CASE-SPECIFIC EXPERT WITNESSES**

Pursuant to Pretrial Order (PTO) # 243, Rule 26 (a)(2) of the Federal Rules of Civil Procedure, Plaintiff in the above-captioned civil action ("Plaintiff") submits the following Designation and Disclosure of Case-Specific Expert Witness and persons who may provide expert testimony specific to Plaintiffs' case pursuant to Rule 702 of the Federal Rules of Evidence.

RETAINED EXPERT WITNESSES

- 1) Dr. Bruce Rosenzweig (Urogyencologist – General) (adoption of previously served expert reports)
1725 W. Harrison Street, Suite 358
Chicago, IL 60612
- 2) Dr. Jimmy W. Mays (Materials – General) (adoption of previously served report)
Department of Chemistry
University of Tennessee at Knoxville
655 Buehler Hall
Knoxville, TN 37996
- 3) Dr. Vladimir Iakolev (Pathologist – General) (adoption of previously served report)
St. Michael's Hospital, Division of Pathology
30 Bond Street
Toronto, Ontario M5B 1W8

4) Dr. William E. Porter (Urogynecologist – Case Specific Causation)
6324 Fairview Road, Suite 390
Charlotte, NC 28210

5) Dr. Daniel S. Elliott (Urologist - General) (adoption of previously served report)
Mayo Clinic, Department of Urology
200 1st Street SW
Rochester, MN 55902

NON-RETAINED EXPERT WITNESSES

NAME	ADDRESS	SPECIALITY
Dr. Kenneth G. Singleton	Cornerstone Clinic for Women 1 Lile Court, Suite 200 Little Rock, AR 72205	Obstetrics and Gynecology
Dr. Sallie Oliphant	University of Arkansas Medical Sciences, 4301 West Markham Road, Little Rock, AR 72205	Obstetrics and Gynecology; Female Pelvic Medicine and Reconstructive Surgery
Dr. William W. Greenfield	University of Arkansas Medical Sciences, 4301 West Markham Road, Little Rock, AR 72205	Obstetrics and Gynecology

A General Designation and Disclosure has been or is being served by and on behalf of the wave 4 cases for general expert opinions. In the event that any of the general expert(s) identified above is/are unavailable for trial in this case, Plaintiff reserves the right to elicit testimony, either through direct examination or cross-examination, of other of the general witnesses designated or identified by Plaintiff. In no event, however, will Plaintiffs' retained experts at trial exceed five (5) experts without leave of Court for good cause shown. Plaintiff further reserves the right, as allowed by Rule 26(e) of the Federal Rules of Civil Procedure, to supplement this Designation and Disclosure of Expert Witnesses through the discovery process upon receiving additional discovery including, but not limited to, expert depositions, fact

depositions, exhibits introduced in depositions, documents produced, and any supplemental expert disclosures by any party.

Respectfully submitted,

BERTRAM & GRAF, L.L.C.

Dated: January 17, 2016

/s/ Benjamin A. Bertram

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